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11 *Attorneys for Defendant Samsung Electronics*  
12 *America, Inc.*

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 JAY GELIZON,  
individually and on behalf of all others similarly  
17 situated,

18 Plaintiff,

19 vs.

20 SAMSUNG ELECTRONICS AMERICA, INC.,

21 Defendant.  
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Case No. 2:22-cv-01706-APG-DJA

**STIPULATION AND ~~[PROPOSED]~~**  
**ORDER EXTENDING TIME TO**  
**RESPOND TO COMPLAINT**

**(FIRST REQUEST)**

1 Defendant Samsung Electronics America, Inc. (“Samsung”) and Plaintiff Jay Gelizon  
2 (“Gelizon”), by and through their respective counsel of record, stipulate and agree as follows:

3 1. Plaintiff filed this lawsuit on September 2, 2022 against Samsung in the Eighth  
4 Judicial District Court, Clark County, Nevada, styled as *Jay Gelizon v. Samsung Electronics*  
5 *America, Inc.*, Case No. A-22-857862-C, Department 3 (the “State Action”).

6 2. Plaintiff served a copy of the Complaint in the State Action on Samsung on  
7 September 14, 2022.

8 3. On October 10, 2022, Samsung removed the State Action to this Court (ECF No.  
9 1).

10 4. Samsung’s time to respond to the Complaint has not passed and runs until October  
11 17, 2022. Fed. R. Civ. P. 81(c)(2)(C).

12 5. Samsung respectfully requests a forty-nine (49) day enlargement of time, up to and  
13 including December 5, 2022, in which to answer, move, or otherwise respond to the Complaint so  
14 that it may, among other things, gather information related to the allegations in the Complaint.

15 6. Plaintiff previously agreed to the same enlargement of time in the State Action,  
16 and, by this stipulation, reaffirms that agreement now that the case has been removed to this Court.

17 7. This stipulation is brought in good faith and not for the purpose of delay.

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8. This is the first request filed in this Court for an extension of the deadline to respond to the Complaint.

Dated: October 11, 2022

Dated: October 11, 2022

KIND LAW

DICKINSON WRIGHT PLLC

/s/ Michael Kind

/s/ Justin J. Bustos

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*Attorneys for Defendant Samsung Electronics  
America, Inc.*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: October 12, 2022

**CERTIFICATE OF SERVICE**

I certify that I am an employee of DICKINSON WRIGHT PLLC, and that on this date, pursuant to NRCP 5(b), I am serving a true and correct copy of **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT** on the parties through the United States District Court's CM/ECF and email as set forth below:

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DATED this 11th day of October, 2022.

/s/ Laura P. Browning  
An Employee of DICKINSON WRIGHT PLLC